

ACEEE has reviewed the Draft 2 specification for Energy Star qualified Refrigerated Beverage Vending Machines and we generally find it very good. The only item we think needs to be changed is the specification for glass-front machines. In our opinion the proposed spec is overly weak and therefore will not save much energy but instead will devalue the Energy Star brand. Perhaps even more importantly, the spec for glass-front machines, as far as we know, is not based on any test data and thus only a guess as to what is reasonable. We recommend that no spec be set now for glass-front machines but instead EPA indicate that a spec for glass-front machines will be set in the next year, once sufficient analysis can be performed and performance data can be gathered. This can be done in conjunction with the process to develop an Energy Star spec for refurbished machines.

We believe that the current proposed spec for glass-front machines is too weak because the CSA baseline is based on testing at 90 degrees F and the glass-front machines are tested at 70 degrees F. We estimate that in most cases at least half of the 45% savings relative to baseline can be achieved just by the change in test temperature, without any modifications to the machine. In our opinion, the baseline will need recalibrating to approximate testing at 70 degrees F. Alternatively, the savings threshold can be increased beyond 45%, to account for the savings achieved just by changing test temperatures. With either approach, actual test data should be used to ascertain the reasonableness of these adjustments.

With the exception of the glass-front machines, we believe that version 2 of the Vending Machine spec should be made the final spec. We hope this can be done as soon as possible so that the spec may be used as of the beginning of the year.

Please let me know if you have any questions about these comments.

Sincerely,

Steve Nadel
Executive Director
American Council for an Energy-Efficient Economy